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November 16, 2020

**VIA ECF & EMAIL**  
All Counsel of Record

**Re: *Johnson & Johnson Talcum Powder Products, Marketing, Sales Practices  
and Products Liability Litigation*  
Case No. 3:16-md-02738-FLW-LHG**

Dear Counsel,

I am in receipt of the November 12, 2020 letter from The Morelli Firm on behalf of Plaintiff Willa Gamble and the November 13, 2020 response from Defendants, and I have also conferred with the Plaintiffs' Steering Committee ("PSC"), The Morelli Firm and counsel for Defendants.

Ms. Gamble was randomly selected as a *Bellwether* case on October 20, 2020, and pursuant to the deadlines set forth in the Court's case management orders, Ms. Gamble's deadline to revoke the *Lexecon* waiver was October 30, 2020. Ultimately, Ms. Gamble, who is a 73 year old resident of Alabama, determined that she does not wish to waive her *Lexecon* rights. Ms. Gamble also does not agree to have her case tried in the District of New Jersey. Accordingly, on November 12, 2020, Ms. Gamble's counsel filed a letter requesting an extension of the deadline to revoke the waiver of her *Lexecon* rights. The PSC has no objection to Ms. Gamble's request. Defendants object, but indicated they will consent to Ms. Gamble's belated revocation provided that the replacement case is not randomly selected via Random.org (as is the Court-ordered process), but is instead chosen by Defendants.

I am granting Ms. Gamble's request for an extension. Ms. Gamble may file her notice of revocation of the automatic waiver of *Lexecon* rights by November 23, 2020.

I am denying Defendants' request to select the replacement case. Defendants have not offered any persuasive reason to depart from the parties' agreed upon, and Court-ordered, process of having Random.org automatically generate the selected case. Moreover, there is no basis to believe that a plaintiff hand-selected by Defendants would be more or less likely to revoke the automatic waiver of his/her *Lexecon* rights. Accordingly, I will randomly select a replacement case via Random.org.

Sincerely,

s/Joel A. Pisano

Joel A. Pisano